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SEP 15 1998

Mr. James A. Saric, Remedial Project Manager
U.S. Environmental Protection Agency
Region V-SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-1189-98

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

TRANSMITTAL OF RESPONSE TO THE OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS TO THE LEACHATE MANAGEMENT CONTINGENCY PLAN FOR THE ON-SITE DISPOSAL FACILITY

This letter transmits the response to comments on the Leachate Management Contingency Plan for the On-Site Disposal Facility (OSDF). These responses address two minor issues raised by the Ohio Environmental Protection Agency (OEPA). The first issue addresses the concern about the amount of time required to obtain a confined space entry permit while the second issue clarifies the preferred method to treat impacted stormwater runoff.

If you have any questions or need additional information, please contact Jay Jalovec at (513) 648-3122.

Sincerely,

Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:Jalovec

Enclosure

Mr. James A. Saric
Mr. Tom Schneider

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cc w/enclosure:

G. Jablonowski, USEPA-V, 5HRE-8J
T. Schneider, OEPA-Dayton (Total of 3 copies of enc.)
F. Bell, ATSDR
R. Vandegrift, ODF
M. Schupe, HSI GeoTrans
F. Barker, TetraTech
AR Coordinator, FDF/78

cc w/o enclosure:

N. Hallein, EM-423, CLOV
R. Beaumier, TPSS/DERR, OEPA-Columbus
M. Rochette, OEPA-Columbus
D. Carr, FDF/52-2
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M. Hickey, FDF/64
U. Kumthekar, FDF/64
T. Walsh, FDF/65-2

**RESPONSE TO OEPA COMMENTS TO THE
LEACHATE MANAGEMENT CONTINGENCY PLAN
FOR THE ON-SITE DISPOSAL FACILITY**

1. Comment Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: 3 Line #: 3 Code: c

Comment: The Plan states that the LCS manhole could be converted into a wet well by removing the piping manifold and installing blank flanges on all but the incoming leachate collection pipeline from the cell. These actions require one or more workers to enter the manhole. How long will it take to obtain the required confined space entry permits, and how long will it take to perform the work?

Response: In response to the first question, the On-Site Disposal Facility (OSDF) Project will obtain the standing permits (permits issued prior to initiating work activities) required to enter the manholes on an as needed basis. As such, there will not be any time issue to obtain the required permits. The work required to remove the piping manifold and install the blank flanges would require no more than 8 hours.

Action: None.

2. Comment Organization: Ohio EPA Commentor: OFFO
Section #: Impacted Runoff Pg #: 4 Line #: Method 2 Code: c

Comment: Method 1 involves pumping impacted runoff to a drainage ditch which flows into the Impacted Runoff Sediment Basin. This approach is satisfactory. It is unclear why Method 2 pumps impacted runoff to the LCS gravity pipeline. The 200 gpm limitation on flows to the LCS pipeline appear to greatly limit the use of this method. It is also not clear under which circumstances Method 1 or Method 2 would be applied.

Response: Method 1 is the preferred impacted runoff control for the contingency plan.

Method 2 is identified for use only if:

A. The FEMP plant storm drainage system; and/or the Storm Water Retention Basin (SWRB) has been determined to be unavailable for handling impacted runoff from the OSDF during the implementation of the contingency plan.

or

B. Additional pumping of impacted runoff is required to empty the runoff in cell (catchment area) from a rainfall event greater than the design storm.

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Method 2 provides the option to use the LCS gravity pipeline to the Permanent Lift Station (albeit a restricted flow) and then to the AWWT Plant for treatment via the existing pumps or tanker. Method 2 will take a little longer to "process" the impacted runoff, but it will provide a means to empty/handle the runoff and dry out a cell in order to resume impacted material placement.

Action: None.